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*Attorney for Longfeng Corporation
dba New XO Market and Party Poker
Guowu Li, and Xu Gui Qing*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

ABU YOUSUF

Plaintiff,

-vs-

**LONGFENG CORPORATION dba NEW
XO MARKET and PARTY POKER,
GUOWU LI, XU GUI QING, and
FELOTEO V. RANADA dba NVM
ENTERPRISES, jointly and severally,**

Defendants.

CIVIL ACTION NO. 1:21-CV-00015

**DECLARATION OF COUNSEL IN
SUPPORT OF JOINT MOTION FOR
APPROVAL OF SETTLEMENT
AGREEMENT UNDER
THE FAIR LABOR STANDARDS ACT**

Date:

Time:

Judge: Hon. Ramona V. Manglona

1 I, Colin M. Thompson, hereby declare:

2 1. I am over the age of eighteen, competent to make this declaration, and all statements
3 made in this declaration are made based on my personal knowledge unless specifically
4 indicated otherwise.

5 2. I am counsel, along with Steven P. Pixley, for Defendants Longfeng Corporation *dba*
6 New XO Market and Party Poker, Guowu Li, and Xu Gui Qing (collectively
7 “Defendants”).

8 3. I submit this declaration in support of the Joint Motion for Approval of Settlement
9 Agreement Under the Fair Labor Standards Act.

10 4. Throughout this proceeding, my office disclosed a total of five hundred seventy-three
11 (573) pages of documents to Plaintiff Abu Yousuf (“Yousuf”) and Defendant Feloteo
12 V. Ranada (“Ranada”) on behalf of the Defendants.

13 5. Throughout this proceeding, the Defendants engaged in five (5) different oral
14 depositions: two (2) oral depositions of Yousuf; one (1) oral deposition of ex-Plaintiff
15 Md. Rokonnuzzaman; one (1) oral deposition of Ranada; and one (1) oral deposition
16 of Longfeng’s 30(b)(6) agent, Jeremiah Wolfe.
17

18 Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury under the laws of
19 the United States of America that the foregoing is true and correct and execute this declaration
20 on the island of Saipan, Commonwealth of the Northern Mariana Islands on September 15,
21 2023.

22 /s/Colin M. Thompson
23 Colin M. Thompson
24
25